

EXHIBIT F

Kathleen Sullivan (SBN 242261)
kathleensullivan@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Sean S. Pak (SBN 219032)
seanpak@quinnemanuel.com
John M. Neukom (SBN 275887)
johnneukom@quinnemanuel.com.
QUINN EMANUEL URQUHART &
SULLIVAN LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Mark Tung (SBN 245782)
marktung@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Steven Cherny (admitted *pro hac vice*)
steven.cherny@kirkland.com
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Adam R. Alper (SBN 196834)
adam.alper@kirkland.com
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, California 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500

Michael W. De Vries (SBN 211001)
michael.devries@kirkland.com
KIRKLAND & ELLIS LLP
333 South Hope Street
Los Angeles, California 90071
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

Attorneys for Plaintiff Cisco Systems, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CISCO SYSTEMS, INC.,

Plaintiff,

v.

ARISTA NETWORKS, INC.,

Defendant.

CASE NO. 5:14-cv-05344-BLF

**PLAINTIFF CISCO SYSTEMS, INC.
FIRST SET OF REQUESTS FOR
PRODUCTION (NOS. 1-84) TO
DEFENDANT ARISTA NETWORKS,
INC.**

1 **REQUEST FOR PRODUCTION NO. 21:**

2 All Communications, Documents, and Things Concerning the marketing or advertising of
3 each Accused Product, including all marketing studies, marketing plans, marketing surveys,
4 competitive product analyses, promotional material, informational material, advertising material,
5 sales training materials, and memoranda to sales personnel.

6
7 **REQUEST FOR PRODUCTION NO. 22:**

8 All Communications and Documents Concerning any product reviews, comparisons, and
9 performance tests or evaluations with respect to products that compete, directly or indirectly, with
10 any of the Accused Products.

11
12 **REQUEST FOR PRODUCTION NO. 23:**

13 Documents sufficient to identify the internal and external name(s) of each Accused
14 Product.

15
16 **REQUEST FOR PRODUCTION NO. 24:**

17 Documents sufficient to identify the internal and external model number(s) of each
18 Accused Product.

19
20 **REQUEST FOR PRODUCTION NO. 25:**

21 Documents sufficient to correlate the internal and external name(s) and internal and
22 external model number(s) of each Accused Product.

23
24 **REQUEST FOR PRODUCTION NO. 26:**

25 Documents sufficient to identify the U.S. release dates of each Accused Product.

1 **REQUEST FOR PRODUCTION NO. 27:**

2 Documents sufficient to identify the time period during which each Accused Product was
3 sold or offered for sale in the U.S.
4

5 **REQUEST FOR PRODUCTION NO. 28:**

6 Documents sufficient to identify the total number of units sold, the gross revenue (in U.S.
7 dollars), the net profits (in U.S. dollars), the profit margins (in U.S. dollars), and the costs (in U.S.
8 dollars) associated with each Accused Product for each yearly quarter dating back to October
9 2004.
10

11 **REQUEST FOR PRODUCTION NO. 29:**

12 Documents sufficient to correlate the internal and external name(s) and internal and
13 external model number(s) of each Accused Product with the quarterly sales, revenue, and profit
14 You obtained from each Accused Product.
15

16 **REQUEST FOR PRODUCTION NO. 30:**

17 All Communications, Documents, Source Code, and Things Concerning the statement in
18 Your Answer, that “Arista’s products would be driven by a completely new operating system,
19 developed from scratch, that offered a fresh, open, programmable and modular architecture in
20 contrast to the closed, proprietary systems used by legacy vendors such as Cisco.”
21

22 **REQUEST FOR PRODUCTION NO. 31:**

23 All Communications, Documents, Source Code, and Things Concerning the statement in
24 Your Answer, that “Although EOS’s architecture was radically different than Cisco’s, Arista
25 openly advertised that its switches could be configured and monitored using well-known ‘industry
26 standard’ command-line interface (‘CLI’) commands that were commonly used with Cisco
27 routers.”
28

PROOF OF SERVICE

I hereby certify that, at the date entered below, I caused a true and correct copy of the foregoing to be served by transmission via electronic mail to the addresses below and that I caused a true and correct copy of the foregoing to be served by placing true and correct copies thereof in an envelope addressed to the persons named below at the addresses shown, and by sealing and depositing that envelope in the United States Mail at San Francisco, California, with fully prepaid postage:

Juanita R. Brooks
brooks@fr.com
Fish & Richardson P.C.
12390 El Camino Real
San Diego, CA 92130-2081

Kelly C. Hunsaker
hunsaker@fr.com
Fish & Richardson PC
500 Arguello Street, Suite 500
Redwood City, CA 94063

Ruffin B. Cordell
cordell@fr.com
Lauren A. Degnan
degan@fr.com
Michael J. McKeon
mckeon@fr.com
Fish & Richardson PC
1425 K Street NW
11th Floor
Washington, DC 20005

Brian L. Ferrall
blf@kvn.com
Michael S. Kwun
mkwun@kvn.com
David J. Silbert
djs@kvn.com
Robert Van Nest
rvannest@kvn.com
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111-1809

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 26, 2015, at San Francisco, California.

/s/ Matthew D. Cannon

Matthew D. Cannon